

Honorable Tana Lin

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

ERIN MCPEAK

Plaintiff,

vs.

COREY BUTCHER IN HIS INDIVIDUAL
CAPACITY AND IN HIS OFFICIAL
CAPACITY;;

KEVIN ENGELBERTSON IN HIS
INDIVIDUAL AND OFFICIAL CAPACITY ;

LEWIS COUNTY SHERIFF'S
DEPARTMENT;

SHERIFF **ROBERT SNAZA** IN HIS
OFFICIAL AND INDIVIDUAL CAPACITY;

CENTRALIA POLICE DEPARTMENT;

CHIEF **STACY DENHAM** IN HIS
INDIVIDUAL AND OFFICIAL CAPACITY

Defendants.

NO. 3:21:CV-05821-TL

~~[PROPOSED ORDER]~~
STIPULATED PROTECTIVE ORDER

Without Oral Argument

This Court, upon Stipulation of the parties for a protective order regarding medical records of any party

STIPULATED PROTECTIVE ORDER — 1

JOSEPHINE C. TOWNSEND
ATTORNEY AT LAW
211 E. 11TH STREET SUITE 104
VANCOUVER WA 98660
360-694-7601
FACSIMILE 360-694-7601
JOSIE@JCTOWNSEND.COM

Hereby ORDERS and DECREES that the following provisions shall apply to the
medical records of any party:

Medical records of any Party, whether or not any privilege is waived, remain sensitive and confidential information, for which wider than necessary disclosure may be embarrassing and an invasion of privacy. Additional information which a party, in good faith, determines to be of a similar nature should also be held confidential. However, there should also be a mechanism for a party to dispute the confidentiality designation of the other party.

1. Information and documents covered by this protective order shall not be used for any purpose except in connection with this litigation, and shall not be delivered, exhibited or disclosed to any person, other than the author of the document in question, except: a) Counsel and their clients involved in this litigation; b) Employees of counsel assisting said counsel in the preparation and trial of this matter; and c) Experts or other witnesses with whom counsel consult in preparation for this litigation, as provided in paragraph 2.

2. Before counsel shall deliver, exhibit or disclose any information and/or document covered by this agreed protective order to any expert or other witness as described in the foregoing paragraph, counsel shall explain the confidential nature of the documents and shall request that said witness or expert refrain from using the documents for any purpose other than in conjunction with litigation of the above-captioned case.

STIPULATED PROTECTIVE ORDER — 2

JOSEPHINE C. TOWNSEND
ATTORNEY AT LAW
211 E. 11TH STREET SUITE 104
VANCOUVER WA 98660
360-694-7601
FACSIMILE 360-694-7601
JOSIE@JCTOWNSEND.COM

1 3. Nothing in this protective order shall prevent the use of covered material at time of trial;
2 on motion, including summary judgment; or in any discovery hearing or deposition.

3 Nothing in this protective order shall be considered a waiver of any objection or response to
4 objection regarding admissibility or use of covered material.

5 4. The terms of this protective order may be modified by written stipulation of the parties
6 or the Order of the Court. Any party may apply to the Court for modification or
7 interpretation of this order by written motion.

8 IT IS SO ORDERED.

9 Dated this 3rd day of June 2022.

10 

11 _____
12 Honorable Tana Lin
13 United States District Court Judge
14
15
16
17
18
19
20
21

1 Presented by:

2 *s/Josephine C. Townsend*

3 Josephine C. Townsend WSBA 31965

4 Attorney for Plaintiff

211 E. 11th Street Ste 104

Vancouver WA 98660

360-694-7601

Josie@jctownsend.com

6 SO STIPULATED.

7 */s/ Shane M. O'Rourke* WSBA 39927

8 Shane M. O' Rourke

314 Harrison Avenue

9 P.O. Box 59

Centralia WA 98531

10 360-763-1108

11 */s/ John E. Justice*

12 John E. Justice, WSBA 23042

Law, Lyman, Daniel. Kamerrer & Bodganovich P.S.

13 Attorneys at Law

2674 R.W. Johnson Road

14 Tumwater WA 98512

15 *s/Kevin A. McDowell*

16 Kevin A. McDowell, WSBN 55244

17 Attorneys for Defendants Lewis County,

18 Robert Snaza, and Kevin Engelbertson

21 STIPULATED PROTECTIVE ORDER — 4

JOSEPHINE C. TOWNSEND
ATTORNEY AT LAW
211 E. 11TH STREET SUITE 104
VANCOUVER WA 98660
360-694-7601
FACSIMILE 360-694-7601
JOSIE@JCTOWNSEND.COM

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT ON 6/2/2022, A TRUE AND CORRECT COPY
OF THE FOREGOING DOCUMENT WAS SERVED VIA THE COURT'S ECF
SYSTEM TO ALL COUNSEL OF RECORD.

s/Josephine C. Townsend

Josephine C. Townsend WSBA 31965
Attorney for Plaintiffs and the
Proposed Class
211 E. 11th Street Ste 104
Vancouver WA 98660
360-694-7601
Josie@jctownsend.com

STIPULATED PROTECTIVE ORDER — 5

JOSEPHINE C. TOWNSEND
ATTORNEY AT LAW
211 E. 11TH STREET SUITE 104
VANCOUVER WA 98660
360-694-7601
FACSIMILE 360-694-7601
JOSIE@JCTOWNSEND.COM